## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

GRISSELLE RAMOS, on behalf of herself and all others similarly situated,	)
Plaintiff,	) Case No. 1:08-cv-02703
v.	) Judge Lefkow
PLAYTEX PRODUCTS, INC., RC2 CORPORATION, LEARNING CURVE BRANDS, INC., and MEDELA, INC.,	) Magistrate Judge Schenkier ) ) )
Defendants.	)

## AGREED MOTION OF DEFENDANT PLAYTEX PRODUCTS, INC. FOR AN EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

NOW COME Defendant Playtex Products, Inc. ("Playtex"), by and through their counsel, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure hereby requests the Court to extend the time for them to file their responsive pleading to July 2, 2008. In support of this motion, Defendant states as follows:

- 1. This action was filed on May 9, 2008, and Playtex was served on May 21, 2008. Playtex's responsive pleading is due on June 10, 2008.
- 2. Playtex's counsel is investigating the claims asserted and is in the process of developing a strategy for responding to Plaintiff's claims, and Playtex's counsel seeks additional time, up to and including July 2, 2008, to further its investigation and formulate a responsive pleading.
- 3. On or about June 2, 2008, Playtex's counsel spoke with John Tangren, counsel for the Plaintiff, who indicated that Plaintiff would agree to the requested extension of time.

WHEREFORE, Defendant Playtex Products, Inc. requests that the Court grant them an extension of time to July 2, 2008 to file its responsive pleading.

Respectfully submitted,

LEWIS, RICE & FINGERSH, L.C.

Dated: June 4, 2008

By: /s/ Andrew Rothschild
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Counsel for Defendant Playtex Products, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned attorney states that on June 4, 2008 he caused the foregoing to be filed with the Clerk of the United States District Court for the Northern District of Illinois and a copy of which will be served on the counsel listed below by the Clerk's ECF/CM system:

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/s/ Andrew Rothschild